



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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July 14, 2005

Mr. Jeff Weller
Regional Environmental Coordinator
U.S. Fish & Wildlife Service
1875 Century Boulevard, Suite 200
Atlanta, Georgia 30345

SUBJ: Roanoke River National Wildlife Refuge Draft Comprehensive Conservation Plan
(Plan) and Environmental Impact Statement (EIS)

Dear Mr. Weller:

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the referenced Draft Plan and EIS. The Draft Plan and EIS will outline the programs and resources needed to guide the Refuge, located in Bertie County, NC, for the next 15 years.

As stated in the draft EIS, a principal issue is enhanced surface water management. Current flow management practices affect every aspect of Refuge management including habitat management, maintenance, and public use. The Refuge lies largely in the flood plain of the Roanoke River whose waters are currently managed by the Corps of Engineers for flood control and hydroelectric power generation. The document states that present flow regimes negatively impact health and well-being of the 200,000-acre bottomland hardwood ecosystem comprising the Refuge because controlled flooding events often occur during the growing season, in contrast to natural flooding that predominates during the dormant season. The draft EIS examines three Refuge management alternatives described below.

Alternative 1 is to maintain the status quo whereby the staff does not actively manage habitats on the Refuge, but will continue to provide songbird surveys, perform limited measurement of forest health and regeneration of bottom wood hardwoods. Refuge priority activities that will continue shall include six public use activities: hunting, fishing, wildlife observation, wildlife photography, environmental education and interpretation. Environmental education and interpretation would be available on a request basis only.

Alternative 2 proposes moderate program increases, i.e., develop a Refuge plan and actively manage all habitats. The Refuge would continue to support the six priority activities (see above), but would increase the capacity of public use opportunities. The Service would build a shop and equipment facility, and eleven staff members would be stationed on the

Roanoke River Refuge site.

Alternative 3 (Preferred Alternative) proposes substantial program increases, i.e., Refuge management would develop a habitat management plan for all habitats, a shop and storage facility would be built, and up to twenty-two staff members would be hired, including law enforcement, a hydrologist, and an entomologist. Public use opportunities would be expanded.

EPA Support - EPA supports the Preferred Alternative 3, which maximizes wildlife-dependent uses of Refuge resources, i.e., hunting, fishing, wildlife observation, wildlife photography, environmental education and interpretation. The Refuge faces challenges with regard to environmental impacts of current water management practices, and the need for extensive field data that would be required to begin the process for determining optimal flow regimes for Refuge habitats. Given requirements for flood control and established electric power generation needs, any future changes in flow regimes will have to be done in close consultation with stakeholders, a process that will require considerable staff time and expertise to coordinate and develop habitat management plans.

Vehicular Access - Access to certain tracts is currently limited to refuge staff, however, motorized vehicular access to the Refuge will be need to be expanded. The draft EIS referenced the existence of old logging roads and trails that were formerly used by hunt clubs (Page 52), and the need to develop a draft Road Plan by 2007 was acknowledged (Page 18). The expansion of vehicular traffic to Refuge areas may require management decisions to what extent off-road vehicle (ORV) access will be allowed, and at the same time remain consistent with management objectives.

Increased access to portions the Refuge should be positive and enhance public support and create a strong constituency on behalf of the Refuge. However there are potential conflicts with ORV use and, say, birdwatching and wildlife photography. There are potential environmental concerns for degradation attendant with unrestricted access by 4 x 4s, all-terrain vehicles, and homemade vehicles ("swamp buggies") which can damage Reserve resources. Uncontrolled ORV access can inflict havoc on basic reserve ecological functions, including soil and vegetation degradation and surface channelization of wet areas from rutting caused by wheels. With proper planning, however, these impacts can be mitigated.

Vehicle Management Plans - Management plans controlling appropriate vehicular use and access to Refuge lands need to be contemplated early in the planning process to prevent creation of unauthorized trails and vehicle paths whose use will be hard to curtail once they have become established. Engaging the ORV community in the planning process facilitates establishing and maintaining well-defined boundaries for vehicular use within the Refuge. EPA encourages FWS to address ORV early in the planning process to establish limits and preclude indiscriminate vehicular use becoming entrenched as a right in the minds of the community. EPA encourages Refuge management to adopt a vehicular management plan that employs basic, common sense restrictions on using ORVs in the Refuge, and includes a comprehensive system of primary designated access points and trails, rules governing the operation of vehicles and enforcement of those rules, research methods for monitoring of ORV-related impacts, and habitat

restoration, as needed.

Editorial - Figure 1-2 did not identify the 2,782-acre Rainbow Tract, the 554-acre Rhodes Tract, or the Sunken Marsh Tract, all which were referenced in the text and included in the Appendix IV inventory. Figure 1-2 might be updated in the final EIS.

The mining of building sand on the Askew Tract (Page 31) raises the question of mineral right ownership. The document would be improved if the ownership of the remaining subsurface minerals were discussed in the final EIS.

Summary - EPA appreciates the opportunity to review the referenced EIS and supports the Preferred Alternative 3 which maximizes wildlife-dependent uses of Refuge resources. This action is rated “LO”, that is, Lack of Objections. Additional information on vehicular access to the Refuge might be considered in the final EIS. For more information, please call John Hamilton at (404) 562-9617.

Sincerely,

/S/

Heinz J. Mueller, Chief
NEPA Program Office